

**EPA ID NUMBER VERIFICATION QUESTIONNAIRE
AND
EPA ID NUMBER AND MANIFEST FEE ASSESSMENT**

2008 FREQUENTLY ASKED QUESTIONS

Do you have questions about filling out your annual Verification Questionnaire (**VQ**)? To assist you with the verification process this year, the Department of Toxic Substances Control's (**DTSC**) Generator Information Services Section (**GISS**) is offering the following "Frequently Asked Questions" (**FAQs**). By reading through the FAQs, you may be able to avoid having to call GISS during this busy telephone time. The items directly below are the most common issues with the verification process.

- ▶ **Ownership Change** - See [Question 11](#)
- ▶ **Location Address Change** - See [Question 4](#)
- ▶ **Fee Questions** - See [Questions 7 through 10](#)
- ▶ **Manifest Counts** - See [Questions 16 through 18](#)
- ▶ **Suspended ID Numbers** - See [Question 22](#)
- ▶ **EPA ID Number Issues** - See [Questions 23 through 26](#)
- ▶ **SIC Codes** - See [Question 27](#)
- ▶ **BOE and FEIN ID Numbers** – See [Question 34](#)
- ▶ **2007 Manifest Fee Exemption for businesses with less than 100 employees** – See [Questions 35 through 39](#)
- ▶ **2006 Manifest Fee Credit for businesses with less than 100 employees** – See [Questions 40 through 47](#)

- 1. Why does DTSC need this information?** The facility information you provide to get an EPA Identification number is critical for state and local regulators who enforce hazardous waste laws. Health and Safety Code section 25205.16 requires DTSC to verify the accuracy of information related to generators, transporters and facilities authorized to treat, dispose of, store, or recycle hazardous waste. DTSC captures this data through the Verification Questionnaire and uses the collected information to ensure that the Hazardous Waste Tracking System (HWTS) database is current and accurate.

The EPA ID Number Verification Fee, which has been established by State legislation, funds this effort.

- 2. What forms must I return to DTSC?** Return all the forms you receive. Failure to return the VQ package will lead to inactivation of the EPA ID number.

If you received the VQ package (for permanent EPA ID number holders) you **must return** the VQ (page 1) ***whether or not you have any changes***, Schedule A (page 3) and Schedule B, along with your payment if any is due. Your verification process will not be considered complete if you do not return all forms.

If you received the Manifest Fee Assessment package (for temporary or out-of-state ID number holders), you must return the assessment form with your payment if any is due.

3. **I have been calling and cannot get through to GISS staff. I do not have a question about the verification questionnaire; I need a new EPA ID number.** For permanent EPA ID numbers, please download [DTSC Form 1358](#). You will get a set of instructions and an application form to complete.

If you need a temporary (90-day) EPA ID number, and you are calling from within California, please call (800) 618-6942. When you hear the recorded message, please press 1 and then 3 to get to an operator. If you are calling from outside California, call (916) 255-1136. When you hear the recorded message, please press 1 and then 3 to get to an operator.

4. **My business moved, so the site address on my VQ is different. What should I do?** California EPA ID numbers are issued to one specific site and one specific owner. If you move, you must cancel your current EPA ID number. You can do this by checking box 6 on the VQ (page 1) and return it with all of the forms, so we can finalize your paperwork. In order to apply for a new ID number for your new location, please download [DTSC Form 1358](#). You will get a set of instructions to follow and an application form to complete. We recommend that you fax DTSC Form 1358 to DTSC (fax 916-255-4703) and not mail it with the VQ forms, as this will delay the issuance of your new EPA ID number.
5. **My VQ shows the property owner as the owner of my business. This is incorrect and I need to change it. The instructions tell me to call GISS if there is a change of ownership. Do I really need to call?** No. Some older EPA ID numbers may list the property owner where the company owner should be listed. Please update the VQ (page 1) with your proper company owner information and make a note on that portion of the VQ that the preprinted information referred to the property ownership. We will update your records.
6. **Is there a sample manifest that I can review?** You can view a sample manifest, along with additional information on the Hazardous Waste Manifest System, on the U.S. EPA website at <http://www.epa.gov/epawaste/hazard/transportation/manifest/index.htm>. Click on [Uniform Hazardous Waste Manifest \(PDF\)](#) to view the sample manifest.
7. **I completed my VQ and fee schedules and I do not owe any fees. Is this possible?** Yes. This is quite common. If your organization has fewer than 50 employees, your business did not manifest hazardous waste, your business recycled all of your hazardous waste, or you used consolidated manifesting with your transporter, your fees will be zero. However, you are required to complete and return all forms to DTSC.

8. **I don't have any corrections or changes to my VQ and don't owe any fees; do I still have to send in my forms?** Yes, ***you must complete and return all forms to DTSC*** even though you don't owe any fees. You are required by law to verify this information every year. Please don't forget to return the VQ (page 1).
9. **I had zero manifests during 2007. Do I still owe \$7.50?** No.
10. **I want to pay my fees by credit card. How do I do that?** Paying by credit card is easy. Fill out the credit card payment form enclosed in your VQ package and submit it with your VQ form, Schedule A and Schedule B. If you received a manifest fee assessment package, you would follow the same steps by submitting your manifest assessment form and credit card payment form. Returning all forms is required whether you are paying by check or credit card, or if you do not owe a fee. If you pay by credit card, do not use the standard return envelope we provided. To ensure the confidentiality of your credit card information, please send credit card payments with all of your forms to: Accounting Unit, DTSC, P.O. Box 876, Sacramento, CA 95812-0876.
11. **The business name and information shown on the VQ is not mine. What should I do?** If the EPA ID number begins with "CAL" and you have been using the previous owner's EPA ID number, you must stop using it **immediately**, and apply for your own EPA ID number. To apply for a new permanent EPA ID number for your business, please download [DTSC Form 1358](#). You will get a set of instructions to follow and an application form to complete.

You must, however, pay for any manifests that you generated using the previous owner's EPA ID number. You must also correct those manifests. Please see [Question 33](#) below on how to prepare a Manifest Correction Letter.

Prior to returning the forms to DTSC, please make a note on page 1 of the VQ that this is not your EPA ID number for this location. If you obtained a new number prior to June 30, 2008, you should also receive a VQ for your own EPA ID number. However, depending on when your new EPA ID number was issued, you may not receive a VQ until next year. Please complete those forms and return them to DTSC.

Finally, if the EPA ID number on the VQ begins with "CAD", "CAR" or "CAT", please update the information on the VQ. Federal EPA ID numbers are site specific and may be transferred to a new owner at the site. You must also contact U.S. EPA with your updated information. You can reach U.S. EPA at (415) 495-8895.

- 12. I received a manifest fee assessment only, but no VQ. Why?** DTSC does not require verification of facility information on temporary EPA ID numbers or out of state EPA ID numbers. If you manifested during calendar year 2007 using an EPA ID number starting with “CAC” or “CAP” (temporary) or you have an out of state EPA ID number, you are not required to verify your information or pay the EPA ID number verification fee. However, you are required to pay manifest fees.
- 13. I recently inactivated my number but I still received a VQ. Why?** If your EPA ID number had manifest activity during calendar year 2007, you will receive a VQ regardless of whether your EPA ID number was active or inactive. If you *recently* inactivated your EPA ID number, you will still receive a VQ if the number was active at any time during the 2007/2008 fiscal year (July 1, 2007 – June 30, 2008). You must still complete the VQ process by completing and submitting all forms and payment, if any is due. If you recently inactivated your EPA ID number and want it to remain inactive, please check box 6 on page 1 of the VQ.
- 14. My EPA ID number was issued by a state other than California. Do I need to pay the EPA ID Number Verification Fee?** No. California does not assess the Verification Fee on out-of-state EPA ID numbers. However, you are required to pay manifest fees for manifests used on this EPA ID number during calendar year 2007.
- 15. I noticed that there is no pre-printed owner information and contact information on my VQ. Should I call GISS about it?** No. Simply fill in the missing information on the right hand side of the VQ. We will update our database with the information you provide.
- 16. DTSC shows a different manifest count on my VQ than in my records. What should I do?** If you believe the manifest count shown on Schedule A is incorrect, you may use the count from your own files. However, please be aware that any difference between the manifest counts you report and the manifest counts printed on Schedule A is subject to audit by DTSC.
- 17. DTSC shows a manifest count of zero, yet I had several pick ups of hazardous waste during 2007. Why?** Your hazardous waste transporter may be removing your hazardous waste on a consolidated manifest instead of a regular manifest. With this procedure, your transporter assumes responsibility as the generator of the hazardous waste and manifests it on their EPA ID number. You are not responsible for manifest fees for manifests in which you are not the generator. If your transporter used a consolidated manifest, they are required to give you a receipt or bill of lading when they pick up your hazardous waste. You may check with your transporter to see if they are operating as a consolidated manifestor.

If you have manifests for shipments of hazardous waste during 2007 and your transporter did not use a consolidated manifest, but DTSC shows a manifest count of zero, check the generator EPA ID number listed on your manifests. If the incorrect EPA ID number was used, you are required to pay for the manifests. Please correct the manifest counts on Schedule A to match your records. You are also required to correct those manifests to the correct EPA ID number. Please see [Question 33](#) below on how to prepare a Manifest Correction Letter.

- 18. DTSC shows different recycled and non-recycled manifest counts than in my records. What should I do?** If you believe the recycled and non-recycled manifest counts are incorrect, you may use the counts from your own records. However, please be aware that any difference between the recycled and non-recycled counts you report and the counts printed on Schedule A is subject to audit by DTSC. To qualify as a recycled manifest, all lines of waste on the manifest must be recycled. The disposal facility adds a code to the manifest to indicate it was recycled at their facility. The recycling codes can be found in box 19 on the manifest and are H010, H020, H039, H050, or H061. See the [Supplemental California Manifest Instructions](#) for detailed descriptions. In some cases, the initial receiving facility only transfers waste to a different facility that may recycle or otherwise handle the waste. If you claim that waste was recycled that is not documented on a manifest, DTSC may ask for additional documentation.
- 19. I am not sure if my hazardous waste was recycled or not. How can I check on this?** Check item 19 on your federal manifests. If all the blocks for the waste streams have a “H010, H020, H039, H050 or H061”, you may count the waste as recycled. You can also contact your hazardous waste transporter or disposal facility to see if your waste was recycled at a subsequent facility.
- 20. I see the category “air compliance solvents” on Schedule A? What is this?** On January 1, 1999 many businesses were required to switch from petroleum-based solvents to air compliance solvents (also called water-based cleaners). Health and Safety Code section 25205.15 (c) was modified and the fee for a manifest used solely for the hazardous waste derived from air compliance solvents was reduced from \$7.50 to \$3.50. Most air compliance solvents are now recyclable. Therefore, businesses manifesting air compliance solvents on manifests used solely for recycling would not have to pay the manifest fee for those manifests. Manifests used solely for waste derived from air compliance solvents that was not recycled cost \$3.50. For a list of Certified Clean Air Solvent (CAS) Products and Companies go to <http://www.aqmd.gov/rules/cas/index.html>.
- 21. I received my VQs at several different mailing addresses and have had difficulty tracking them down. Is there something I can do to prevent this from happening again?** Yes. Provide DTSC with one mailing address at the top of the VQs. This will ensure that future VQs are mailed in a single package. In addition, if your company applies for new EPA ID numbers throughout the year, they should provide us with the same mailing address.

- 22. The VQ shows that my EPA ID number has been suspended. What does this mean?** Your EPA ID number may be inactive because DTSC did not receive a VQ from your company in the past, or a VQ package may have been returned to DTSC as nondeliverable by the post office. If the statement “Your ID number is suspended.” appears next to your ID Number in the shaded box, the ID Number is not active. To reactivate your EPA ID Number, download [DTSC Form 1358](#). There is a set of instructions and an application form for you to complete. We recommend that you fax DTSC Form 1358 to DTSC (fax 916-255-4703) and not mail it with the VQ forms, as this will delay the reactivation of your EPA ID number.
- 23. I have several EPA ID numbers. Do I have to pay the EPA ID number verification fee rate for each of my ID numbers?** Yes, up to a maximum of \$5,000. Use the chart on Schedule B to determine the fee rate for your company based upon the total number of full time employees in California in your organization, not at each location. An employee must have worked more than 500 hours during the calendar year 2007 to be included in your calculation. Organization is defined as a registered corporation, sole proprietor, partnership or company. For public agencies, “organization” is defined as a city, county, commission, agency, department or district. After determining the total number of California employees, refer to the chart and multiply the rate by the number of EPA ID numbers held by your organization. If the result exceeds \$5,000, pay the maximum verification fee of \$5,000.
- 24. Do I count temporary/part-time employees?** An employee must have worked more than 500 hours during the calendar year 2007 to be included in your total.
- 25. I have received a form that has an EPA ID number beginning with “CAC”. What is this form for?** EPA ID numbers with a prefix “CAC” are California temporary numbers that are issued to businesses, homeowners, and property owners that have a temporary cleanup situation or a one time disposal of hazardous waste. Temporary numbers are good for 90 days from the date issued. If you are a property owner or homeowner, you may have had work or improvements done on your home, building or property. As a result of this work, hazardous waste was generated and a hazardous waste manifest was used to track the disposal of the hazardous waste. This form/assessment is used to determine if you owe manifest fees.
- 26. I have several EPA ID numbers for various sites in California, but did not receive a VQ or manifest assessment for each site. What should I do?** You should receive a VQ or manifest assessment for each California EPA ID number that was active during fiscal year 2007/2008 (July 1, 2007 – June 30, 2008) or manifested during calendar year 2007. You should check with each site or location to see if they received the VQ. Please allow enough time for mail delivery by the post office and within your

organization. If they do not receive the VQ, you should call GISS at (877) 454-4012 if you are dialing within California or (916) 255-4439 if you are outside California to talk to an operator.

Please do not re-create forms and fill in your own information. Re-created VQ forms will be rejected. This will delay your verification process.

- 27. What is the SIC code requested in Item 9?** The Standard Industrial Classification (SIC) code is a 4 digit number that best describes your company's primary business activity. If you do not know your SIC code, you can look it up on the Internet at www.osha.gov/oshstats/sicser.html. You may also find your SIC code in your business plan.
- 28. I want to send in my paperwork by overnight mail. What address should I send it to?** The address for overnight mail is: Accounting Unit, EPA ID, Department of Toxic Substances Control, 1001 I Street, Sacramento, CA 95814-2828.
- 29. I sent in my VQ but forgot to enclose a payment. What do I do?** You can send in your payment with a letter stating that you sent in your VQ but not your payment. The letter must include your EPA ID numbers, business name, phone number, your name and signature. If you did not include your fee schedules with your VQ, include them with your letter and payment.
- 30. I have read the FAQs and instructions in the package, but I still need help filling out my forms and fee schedules.** DTSC's Generator Information Services Section Telephone Information Center staff is available Monday through Friday from 8:30 am to 4:30 pm, Pacific Standard Time. Please call the information number listed at the top of your VQ toll free at (877) 454-4012 if calling from within California or (916) 255-4439 if calling from outside California.
- 31. What is the Department of Toxic Substances Control's tax ID number?** The tax ID number is 68-0281381.
- 32. I heard I can check my facility information online, how can I do this?** DTSC's [Hazardous Waste Tracking System \(HWTS\)](#) allows access to information via 10 public reports.
- 33. I need to write a Manifest Correction Letter (MCL). How do I do this?** You need to submit a manifest correction in writing and send it to DTSC, Generator Information Services Section, Attention: GISS - Manifest Corrections, P.O. Box 806, MS R1-4, Sacramento, CA 95812-0806. You may submit one letter with an attached list or spreadsheet if you have multiple manifests with the same error. Include the following information on your company letterhead:

- 1) State Manifest Document Number: either 8 digits (Pre-September 5, 2006, DTSC 8022A) or 9 digits and 3 alpha characters (on or after September 5, 2006, EPA 8700-22).
- 2) Generator Date; the date the generator signed the manifest.
- 3) Generator EPA ID number used on original manifest, even if it is incorrect.
- 4) The incorrect or incomplete item numbers from the manifest.
- 5) The correct information.
- 6) Signature, title, mailing address and phone number of person submitting the correction.

One MCL that corrects several manifests is sufficient provided it contains items 1 through 5 above for each manifest. If an identical mistake was made on several manifests, simply provide DTSC with a description of the error(s) and/or omission(s) and needed correction(s) followed by a list of the affected Manifest Document Numbers and their shipment dates. Please do not attach copies of manifests to MCLs.

If the incorrect information is simply a discrepancy between the quantity or type of waste designated on the manifest, and the quantity or type of waste the Treatment, Storage, or Disposal Facility (TSDF) actually receives, an MCL is not necessary.

Please send MCLs to:

Department of Toxic Substances Control
Generator Information Services Section
Attention: GISS-Manifest Corrections
PO Box 806, MS R1-4
Sacramento, CA 95812-0806

- 34. What are a Federal Employer Number (FEIN) and a BOE Number and why does DTSC need this information?** DTSC regulates over 100,000 generators, many of which pay fees to DTSC or to the State Board of Equalization. These numbers are needed to be able to track businesses for fee purposes. DTSC is authorized to collect both of these numbers under Health and Safety Code section 25610.16(b)(1).

FEIN: Federal Employer Identification Number. This is a number that is given to a business that identifies a business entity. Generally, businesses need an FEIN. Many one-person businesses use their Social Security number as their FEIN. Additional Information about the FEIN can be found on the IRS website at

<http://www.irs.gov/businesses/small/article/0,,id=98350,00.html>

BOE Number: If your business generates or produces five (5) or more tons of hazardous waste per calendar year, regardless of the final disposition of the waste, you should have a Board of Equalization (BOE) number,

otherwise known as a generator fee account number. If you do not have a BOE number, please leave this space blank and send in all of your VQ forms and payment, if any is due.

If you need a BOE number, please contact BOE at (916) 323-9555 or toll free at 800-400-7115. Please do not delay in sending in your completed VQ forms and payment if you are waiting on a BOE number. You can notify DTSC later when you receive your BOE number. You can find additional information on the BOE website at <http://www.boe.ca.gov/sptaxprog/spenvirofees.htm>.

35. What is the 2007 Manifest Fee Exemption for businesses with less than 100 employees?

Assembly Bill 1803 (AB 1803), which went into effect July 18, 2006, amended Health and Safety Code section 25205.15 to provide that the first four non-recycled manifests used in a calendar year by a business with **less than 100 employees** are not subject to the manifest fee.

36. How do I know if I am entitled to the 2007 manifest fee exemption?

- a) Are you a business? For purposes of this exemption, a business is defined as *all generators or any person, by site, whose act or process produces hazardous waste*. This would also include home owners, property owners, cities, counties and school districts.
- b) Do you have less than 100 employees?
- c) Do you have **non-recycled** manifests with shipment dates between January 1, 2007 and December 31, 2007 that are **not** air compliance solvents manifests?

If you answered yes to **all** of the above, then you may deduct the fee for up to four manifests.

37. How do I file for the 2007 manifest fee exemption?

You deduct the fee for the manifests on Schedule B – Fees Summary Sheet. In Section B on the Summary Sheet, you are instructed to list the manifest number of each manifest you are claiming as free (up to four). If you do not list the manifest number, you cannot claim the manifest as free.

38. I have air compliance solvents manifests. Why can't I claim them?

The fee for these manifests is already a reduced fee (\$3.50). A business can claim as free only those non-recycled manifests that have a fee of \$7.50.

39. I have multiple EPA ID numbers? Do I get four free manifests on each individual ID number?

No. This exemption can be taken only **once** per calendar year per business, even if the business has multiple EPA ID numbers (permanent and/or temporary).

40. What is the 2006 Manifest Fee Credit for businesses with less than 100 employees?

Assembly Bill 1803 (AB 1803), which went into effect July 18, 2006, amended Health and Safety Code section 25205.15 to provide that the first four non-recycled manifests used in a calendar year by a business with **less than 100 employees** are not subject to the manifest fee. Because the effective date was July 18, 2006, the **2006 credit** applies only to the first four non-recycled manifests used with shipment dates from **July 18, 2006 through December 31, 2006**. Because the exemption was not available on last year's manifest assessment Summary Sheet (Schedule B), and manifests which may have been exempt were included in the fees paid, DTSC is offering a credit to be applied against the fees owed for 2007.

*Please note that Form DTSC 1194A2, Schedule A, which includes the manifest counts for 2006, and Form DTSC 1194B2, Schedule B, which includes the section regarding the 2006 credit, were sent only to those businesses that paid for manifests which may be eligible for the credit. In addition to the 2006 manifest counts, Schedule A includes the manifest fees paid for 2006. It is important to note that that the Manifest Counts and Manifest Fees Paid for 2006 listed on Schedule A are the counts and fees your business paid for **all of your ID numbers combined**. This is provided for informational purposes only. You must verify through your records that you paid manifest fees for non-recycled manifests that qualify for the 2006 credit.*

41. How do I know if I am entitled to the 2006 manifest fee credit?

- a) Are you a business? For purposes of this exemption, a business is defined as *all generators or any person, by site, whose act or process produces hazardous waste*. This would also include home owners, property owners, cities, counties and school districts.
- b) Do you have less than 100 employees?
- c) Did you **pay** manifest fees to DTSC for any **non-recycled** manifests with shipment dates between July 18, 2006 and December 31, 2006 that are **not** air compliance solvents manifests?

If you answered yes to **all** of the above, then you may deduct the fee for up to four 2006 manifests from the 2007 manifest fee assessment.

42. How do I file for the 2006 manifest credit?

If, according to DTSC records, you are eligible for the 2006 credit, you received *Form DTSC 1194A2, Schedule A, which includes the manifest counts for 2006*, and *Form DTSC 1194B2, Schedule B*, which includes sections to allow for the credit. On Schedule B, in Section C, you are instructed to list the manifest number of each manifest you are claiming for credit (up to four). If you do not list the manifest number(s), you cannot claim the manifest credit. In Section D you subtract the credit amount from the 2007 manifest fees owed.

- 43. DTSC shows a different 2006 manifest count on my Schedule A than in my records. What should I do?** *Form DTSC 1194A2, Schedule A*, which includes the manifest counts for 2006, was sent only to businesses which are eligible for the 2006 manifest fee credit. If you believe the 2006 manifest counts shown on Schedule A are incorrect, you may use the count from your own files. However, please be aware that any difference between the manifest counts you report and the manifest counts printed on Schedule A is subject to audit by DTSC.
- 44. DTSC shows different recycled and non-recycled manifest counts for 2006 than in my records. What should I do?** *Form DTSC 1194A2, Schedule A*, which includes the manifest counts for 2006, was sent only to businesses which are eligible for the 2006 manifest fee credit. If you believe the recycled and non-recycled manifest counts for 2006 are incorrect, you may use the counts from your own records. However, please be aware that any difference between the recycled and non-recycled counts you report and the counts printed on Schedule A is subject to audit by DTSC. To qualify as a recycled manifest, all lines of waste on the manifest must be recycled. The receiving facility adds a code to the manifest to indicate it was recycled at their facility. The recycling code was 01 or R01 before September 5, 2006 and is now either codes H010, H020, H039, H050, or H061.
- 45. I have air compliance solvents manifests. Why can't I claim them?**
See [Question 38](#) above.
- 46. I have multiple EPA ID numbers? Do I get to claim four 2006 manifest credits on each individual ID number?**
No. This exemption can be taken only **once** per calendar year per business, even if the business has multiple EPA ID numbers (permanent and/or temporary). Because the 2006 credit was not offered on last year's Schedule B, a business may have up to 4 free non-recycled manifests for 2006 (shipment dates between July 18, 2006 and December 31, 2006) **and** up to 4 free non-recycled manifests for 2007 (shipment dates between January 1, 2007 and December 31, 2007.)
- 47. My 2006 credit amount is greater than the 2007 manifest fees owed. What do I do?**
In the event that your 2006 credit amount is more than the 2007 manifest fees owed, please fill in the refund section on *Form DTSC 1194B2, Schedule B* (Section E). **Do not** subtract the refund from the EPA ID Number verification fee owed. If a refund for manifest fees is due, it will be processed separately.

**THANK YOU FOR COMPLETING YOUR
2008 VERIFICATION QUESTIONNAIRE
AND FEE SCHEDULES**